



August 2, 2019

Mr. David Wittiekiend  
Uinta-Cache Forest Supervisor  
857 West South Jordan Parkway  
South Jordan, UT 84095

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Amy W. Hendrickson  
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RE: Notice of Availability for the Draft Environmental Impact Statement; High Uintas Wilderness Domestic Sheep Analysis; Evanston-Mountain View Ranger District, Uinta-Wasatch-Cache National Forest and Roosevelt-Duchesne Ranger District, Ashley National Forest (FS Project ID 44503)

Dear Mr. Wittiekiend,

On behalf of the Wyoming Wool Growers Association (WWGA), we appreciate the opportunity to provide comment on the Draft Environmental Impact Statement and Uinta-Wasatch-Cache National Forest and Roosevelt-Duchesne Ranger District, Ashley National Forest (collectively UWCNF-ANF).

Since 1905, the WWGA has been the voice of Wyoming's sheep industry by working to ensure that federal and state policies are beneficial to those engaged in the livestock industry, particularly in sheep and wool production. The WWGA has an interest in this DEIS because many of the permittees on the allotments discussed in this DEIS are WWGA members and the proposed actions would affect them and our state industry. For this reason, we would request to be kept informed of proposed actions and decisions so that we may have the opportunity to have input on related issues and concerns.

The WWGA strongly supports the proposal to authorize livestock grazing, specifically sheep grazing, on five allotments on the Uinta-Wasatch-Cache National Forest and five allotments on the Ashley National Forest. The DEIS appears thorough and appears to lend solid support to continued grazing, particularly in regard to the rangeland vegetation data provided. Nonetheless, we have identified portions of the DEIS that cause us concern. Many of these points of concern have been expressed in great detail in the comments submitted by Wyoming Department of Agriculture. For the sake of brevity and to avoid repetition, we would like to offer our support for their comments and associate our own comments with theirs.

In addition, we would offer the following comments to consider.

General Comment: On page 55, the statement "Shepherd camps were established when sheep first started to graze the allotments at the turn of the century." In fact, sheep first started to graze the allotments at the turn of the *last* century. There is a big difference between 119 years and 19 years. Though perhaps a technical correction, we believe this is an important point and needs to be corrected.

**Rangeland Vegetation**

This section, both the general and allotment specific portions, demonstrates that sheep grazing has not had a deleterious effect on the condition of rangeland vegetation in the project areas, based on information from numerous studies and despite 100 years or more of sheep grazing. The repeated use of the statement "Over 99% of the studies show ground cover is in satisfactory condition" in the

Effects Analysis the Direct and Indirect Effects (p. 76, p. 77, p. 78 and p. 79), clearly support the position that continued grazing would not be detrimental to the resource.

#### Hydrology

We endorse the comments submitted by the WDA with regard to this section and are strongly concerned about with portions of the current analysis. We believe substantial changes should be made, many of which are suggested by the WDA in their comments. Like WDA, we find much of this section to be ambiguous and inconsistent.

As we read it, the DEIS went from a very careful and well documented analysis of rangeland vegetation to an ambiguous and sometimes biased hydrology analysis based on information from vague sources, one-time event collections and observations and proxy methodology. Contradictions and poorly substantiated conclusions are found throughout this portion. Numerous statements throughout the discussion on pages 100 to 102, appear to point only to domestic sheep as contributors to water quality, while dismissing the contribution that hikers, horseback riders, and even wildlife may have to changes in sediment, nutrients or bacteria in streams. Several times, the DEIS attempts to unilaterally correlate soil erosion with domestic sheep trailing without consideration of the high use of stream crossings by multiple users throughout the summer seasons. The statement on page 125 that “human foot traffic has less impact on trails and streambanks than livestock, but the hydrologist data indicates foot traffic would maintain five-foot wide stream crossing sites”, is unsubstantiated, inappropriate and biased, in our opinion. We suggest that this section be revisited to provide a better foundation for the conclusions it presents. If the conclusions cannot be substantiated, then they should be removed.

#### Wildlife

The discussion of Bighorn Sheep (BHS) and the risk of transmission of certain pathogens from domestic sheep was interesting. We appreciate the inclusion of recent research indicating the complexity of this issue, in particular that the pathogen *Mycoplasma ovipneumonia* can be isolated in species other than domestic sheep.

We also appreciate the acknowledgement in the DEIS that all five bighorn herds are positive for pathogens (p. 144 “The pathogen (*Mycoplasma ovipneumonia*) has been detected in all five herds and is thought to be contributing to disease (bronchopneumonia) in the herds (USDA Forest Service 2019).” This is an important point as it means there is a constant risk of pathogen transmission among members of the herd and supports the position that removal of domestic sheep from forest service allotments would not alleviate the potential for pathogen transmission.

We were very interested in the discussion of the Risk of Contact (ROC) model. The DEIS acknowledges that the ROC tool does not actually determine whether physical contact between domestic sheep and bighorn sheep will occur but rather only identifies the risk that a bighorn sheep may enter the boundaries of the allotment in question. We have been pushing this point for several years, including that the ROC tool is misnamed.

The ROC also does not determine whether pathogen transmission would occur, even if BHS comes into contact with a domestic sheep allotment. P. 155: “Although the overlap poses a “high” ROC of BHS with four Forest Service domestic sheep allotments, it is unknown how many times a BHS would need to contact a domestic sheep allotment (or lands with domestic sheep use) for interspecies contact to occur.”

Nonetheless, the above statement goes on to conclude that “when interspecies contact does occur, it is likely to result in pathogen transfer to BHS (USDA Forest Service 2019)”. We do not agree with this conclusion and request it be removed. Since the pathogen is known to be present in the BHS population and could be transferred between members of the BHS herds it is irrelevant that they might have contact with domestic sheep.

These discussions reveal that the statement in table 6, "the ROC is 0 for all 10 allotments" (p 33) is inaccurate. The risk of foray onto the allotment remains the same and risk of pathogen continues to exist because of its presence in a large percentage of all five herds.

We are grateful for the opportunity to weigh in on this Draft EIS. We support the selection of Alternative 2. We encourage you to ensure that sound science and methodology be incorporated into the areas of the DEIS where vagueness, bias and inconsistencies now exist. To this end, we again reiterate our support for the points raised by the WY Department of Agriculture in their comments. Lastly, we repeat our request to be kept informed on the progress of this environmental impact statement. If we can provide further information, please don't hesitate to contact us.

Sincerely,

  
Amy W. Hendrickson  
Executive Director

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